



October 18, 2018

via Electronic filing and e-mail

Marlene H. Dortch
Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RE: Ex Parte Presentation, Revisions to Reporting Requirements Governing Hearing Aid
Compatible Mobile Handsets, WT Docket No. 17-228

Dear Ms. Dortch,

On October 16, 2018, Lise Hamlin of the Hearing Loss Association of America (HLAA), and Linda Kozma Spytek of Gallaudet University Technology Access Program (TAP) held a conference call with Eliot Greenwald, DRO/CGB and Susan Bahr, DRO/CGB.

During this teleconference, HLAA raised concerns that in the First Report and Order on HAC phones (First HAC R&O), issued in 2008, certain parts of ¶112 have not been codified into 47 CFR § 20.19(c)(4)(i), (d)(4)(i).¹

The First HAC R&O states:

¶112. In addition to improvements to the Commission's website, databases and processes, we find it essential to the proper functioning of our hearing aid compatibility rules that manufacturers and service providers make certain limited categories of up-to-date information available on their websites. Specifically, we require manufactures and service providers, beginning January 15, 2009, to post a list of the hearing aid-compatible models that they offer (identified by marketing model name/numbers(s)), the hearing aid compatibility ratings of these models and explanation of the rating system. In addition, as suggested by Gallaudet/RERC, we require service providers to post the level of functionality for each model and explanation of the service provider's methodology for designating levels of functionality. **This list and related information should be**

¹ Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets; Petition of American National Standards Institute Accredited Standards Committee C63 (EMC) ANSI ASC C63®, First Report and Order, 23 FCC Rcd 3406, 3450, para. 112 (2008)

updated within thirty days of any relevant changes. Although manufacturers and service providers are also required to provide this information annually to the Commission, such information will inevitably become dated over the course of a year. Thus, updated website postings are necessary both so that consumers can obtain up-to-date hearing aid compatibility information from their service providers and so that service providers can readily obtain such information from their manufacturer supplies.

We discussed that HLAA and TAP agree with the Commission that it is necessary and important to consumers to have access to the most accurate and complete information available when searching for a HAC handset. We also agree that up to date information on provider and manufacturer's website is essential to accomplish this goal. We urge the Commission to codify the following sentence in the rules as:

“This list and related information shall be updated within thirty days of any relevant changes”

Respectfully submitted,

/s/Lise Hamlin

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